

**C L I F F O R D
C H A N C E**

CLIFFORD CHANCE US LLP

2001 K STREET NW
WASHINGTON, DC 20006 - 1001
TEL +1 202 912 5000
FAX +1 202 912 6000
www.cliffordchance.com

Via ECF

The Honorable Sarah Netburn
Judge, United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Direct Dial: +1 202 912 5109
E-mail: steve.cottreau@cliffordchance.com

June 13, 2017

In re Terrorist Attacks on September 11, 2001, 03 MDL 1570

Dear Judge Netburn,

We write to you on behalf of Defendants' Executive Committee and Plaintiffs' Executive Committees ("Committees") regarding the Court's June 19, 2017 deadline for the submission of a joint proposed deposition protocol.

The parties collectively met and conferred in good faith at Clifford Chance's Washington D.C. office this afternoon and were able to make substantial progress toward a joint proposal. We have agreed to circulate a revised proposal reflecting that progress and to continue to confer.

To permit sufficient time to continue our dialogue, the parties jointly request that the Court's deadline to submit a joint proposal be extended to July 7, 2017. We appreciate the Court's indulgence while the parties continue to make productive progress.

We are grateful for the Court's attention to this matter.

Sincerely,

/s/ Steven T. Cottreau

Steven T. Cottreau